



1 The instant request is not intended to cause delay and is necessary because counsel for  
2 Defendant has been out of the office sick for more than a week, and because of the heavy workload of  
3 counsel for Defendant, who is responsible for briefing dispositive motions in seven federal district  
4 court cases between December 16, 2015 and January 7, 2016, as well as other agency matters.

5 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of  
6 time to respond to Plaintiff's motion, up to and including January 20, ~~2015~~ <sup>2016</sup>.

7 Dated: December 21, 2015.

8 Respectfully submitted

9 DANIEL G. BOGDEN  
10 United States Attorney

11 /s/ Marla K. Letellier  
12 MARLA K. LETELLIER  
Special Assistant United States Attorney

13 OF COUNSEL:

14 DEBORAH STACHEL  
15 Acting Regional Chief Counsel  
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17 IT IS SO ORDERED:

18   
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: December 22, 2015  
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**CERTIFICATE OF SERVICE**

I, Marla Letellier, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

**CM/ECF:**

David M. Moore, Esq.  
Edward M. Bernstein & Associates  
500 S. Fourth St.  
Las Vegas, NV 89101  
Email: [dmoore@edbernstein.com](mailto:dmoore@edbernstein.com)

Dated this 21st day of December, 2015

/s/ Marla K. Letellier  
MARLA K. LETELLIER  
Assistant United States Attorney